

# NEVADA DIVISION OF ENVIRONMENTAL PROTECTION

## FACT SHEET

(pursuant to NAC 445A.236)

**Permittee Name:** Wells Manufacturing Company, 2 Erik Circle, P.O. Box 280, Verdi, Nevada 89439

**Permit Number:** NV0021849

**General:** Wells Manufacturing Company produces stainless steel commercial cooking equipment. Products include griddles, french-fryers, food warmers and specialty items for fast food chains. The process includes sheet metal forming, welding, deep drawing, punching and assembly of completed products. Water from a local spring is utilized for once-through non-contact cooling water for the welding heads. This permitted discharge is for the non-contact cooling water only. Process waters are handled as a separate wastestream that is not discharged to surface waters of the State. The spring is registered under PWS#773 as source water for the Verdi Mutual Water Company. The water company is maintained by Wells Mfg, and is a non-transient/non-community water system.

**Receiving Water Characteristics:** Wells Manufacturing discharges to the Truckee River via the Sierra Pacific Power Company's hydrogeneration by-pass/overflow ditch. The "Truckee River at Idlewild" water quality standards apply for this stream segment (NAC 445A.185). Waters of the Truckee River are of good quality in this segment. Beneficial uses of the Truckee River at Idlewild are (NAC 445A.183): irrigation, watering of livestock; recreation involving contact with the water; recreation not involving contact with water; industrial supply, municipal or domestic supply, or both; propagation of aquatic life including all stages of mountain whitefish, rainbow trout, and brown trout.

**Description of the Location of the Discharge:** The facility discharge outfall is located in relative proximity to the originating spring on the Wells Manufacturing site. The Division has received documentation that water from the spring would be discharging to the by-pass ditch even if not used by the permittee.

**Flow:** Daily maximum flow is 0.055 MGD, 30-day average flow is 0.054 MGD.

**Quantities:** See the Effluent Limitations table for permitted quantities.

**Procedures for Public Comment:** The Notice of the Division's intent to issue a permit authorizing the facility to discharge to surface waters of the State of Nevada subject to the conditions contained within the permit, is being sent to the **Reno Gazette-Journal** for publication. The notice is being mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit can do so in writing for a period of 30 days following the date of the public notice. The comment period can be extended at the discretion of the Administrator.

A public hearing on the proposed determination can be requested by the applicant, any affected State, any affected interstate agency, the Regional Administrator or any interested agency, person or group of persons. The request must be filed within the comment period and must indicate the interest of the person filing the request and the reasons why a hearing is warranted. Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determined to be appropriate. All public hearings must be conducted to accordance with NAC 445A.238. The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

**Proposed Effluent Limitations:** The spring used by the Verdi Mutual Water Company and operated by Wells Manufacturing Company is of drinking water quality as determined by the Washoe County District Health Department.

Effluent limitations based on the Truckee River water quality standards at the Idlewild monitoring station were used to develop the following effluent limitations. See Rational for Permit Requirements for further discussion of effluent limitations.

**TABLE I.1: Effluent Limitations**

<u>PARAMETERS</u>	<u>EFFLUENT DISCHARGE LIMITATIONS</u>		<u>MONITORING REQUIREMENTS</u>		
	30 Day Ave.	Daily Maximum	Sample Location(s)	Measurement Frequency	Sample Type
Flow	0.054 MGD	0.055 MGD	Effluent	Continuous	Flow meter
Copper	Monitor & Report		Inf. & Eff.	Quarterly	Discrete
pH	The change in pH between the inf. and the eff. shall not be more than $\pm 0.5$ S.U.		Inf. & Eff.	Quarterly	Discrete
Total Phosphorus as P	Monitor & Report		Influent	Quarterly	Discrete
	0.25 lbs/day <sup>(1)</sup>		Effluent	Quarterly	Discrete
Total Nitrogen as N	Monitor & Report		Influent	Quarterly	Discrete
	0.75 lbs/day <sup>(1)</sup>		Effluent	Quarterly	Discrete
Total Dissolved Solids	Monitor & Report		Influent	Quarterly	Discrete
	100 lbs/day <sup>(1)</sup>		Effluent	Quarterly	Discrete
Temperature	$\Delta T = 0^{\circ}C$		10' Upstream & 30' Downstream	Quarterly	Discrete
Dissolved Oxygen	Monitor & Report		Effluent	Quarterly	Discrete
Chlorides	Monitor & Report		Effluent	Quarterly	Discrete
Total Suspended Solids	Monitor & Report		Effluent	Quarterly	Discrete
Sulfate	Monitor & Report		Effluent	Quarterly	Discrete
Sodium-SAR	Monitor & Report		Effluent	Quarterly	Discrete

<sup>(1)</sup> Pounds/day = Concentration (mg/l) x Flow (MGD) x 8.34

**Schedule of Compliance:** None.

**Special Conditions:** The permit is making use of the concept of intake credits as outlined in 40 CFR 132 Appendix F for copper. Intake credits as described in 40 CFR 132 (the Great Lakes Initiative) were not adopted for the State of Nevada, however, the Division is utilizing the concept as it appears to be an appropriate permitting strategy.

“An intake pollutant from groundwater may be considered to be from the same body of water if the permitting authority determines that the pollutant would have reached the vicinity of the outfall point in the receiving water within a reasonable period had it not been removed by the permittee.” The Division believes that this applies to the Wells Manufacturing water supply because it is a spring which would discharge to the Truckee River, via the Sierra Pacific Power Company Bypass, even if the permittee did not temporarily remove the water for this non-contact cooling use. The Division believes that the following items regarding use of intake credits are satisfied by this discharge.

- 1) The facility withdraws 100 percent of the intake water containing the pollutant from the same body of water into which the discharge is made;
- 2) The facility does not contribute any additional mass of the identified intake pollutant to its wastewater;
- 3) The facility does not alter the identified intake pollutant chemically or physically in a manner that would cause adverse water quality impacts to occur that would not occur if the pollutants were left in stream;
- 4) The facility does not increase the identified intake pollutant concentration, as defined by the permitting authority...at the point of discharge unless the increased concentration does not cause or contribute to an excursion above an applicable water quality standard; and
- 5) The timing and location of the discharge would not cause adverse water quality impacts to occur that would not occur if the identified intake pollutant were left in-stream.

**Rationale for Permit Requirements:** Monitoring for copper is required to demonstrate that the assumptions regarding intake/effluent water quality and associated “intake credits” are maintained throughout the permit life. A reopener clause was included in the permit authorizing modification or revocation and reissuance of the permit if new information indicates changes in the conditions evaluated for allowance of the “intake credit” procedure.

This facility’s average influent pH value is 6.738 standard units (S.U.), and the average effluent pH value is 6.74 S.U. Therefore, due to the quality of the spring water, Wells Manufacturing cannot meet the Requirement to Maintain Existing Higher Quality (RMHQ) for pH, which is 7.2 to 8.3 S.U. This draft permit renewal uses the Water Quality Standard for Beneficial Uses (WQS), proposing to set the pH limit to be no more than  $\pm 0.5$  S.U. between the influent and the effluent.

The Truckee River has a defined Total Maximum Daily Load (TMDL) for Total Phosphorous at the Lockwood monitoring station. Based on a draft policy that is currently undergoing a public notice period, this facility would fall under a definition for a “de minimis” load for total phosphorous. A de minimis load is being defined as that which is less than 1 lb/day. The loading limit defined in the effluent limitations is conservative at 0.25 lbs/day and is based on  $0.054 \text{ MGD} \times 8.34 \times 0.55 \text{ mg/l-P}$ . The average total phosphorous concentration for the last 6 years was 0.29 mg/l-P; therefore, the facility should be able to routinely meet this limit.

The Truckee River has a defined TMDL for Total Nitrogen at the Lockwood monitoring station. Since it was not a required sampling parameter in the previous permit, this facility has no routine nitrogen monitoring data.

However, data collected by the Washoe County District Health Department for the Verdi Mutual Water Company indicates that Nitrate as N has ranged from <0.05 mg/l (Nov. 98) to 1.1 mg/l (Nov. 96 & June 97). Based on the draft policy mentioned above, it is presumed that this facility will fall under a definition for a “de minimis” load for total nitrogen. A de minimis load is being defined as that which is less than 1 lb/day. The loading limit defined in the effluent limitations is believed to be conservative at 0.75 lbs/day and is based on 0.054 MGD x 8.34 x 1.66 mg/l-N. The permit contains a condition which would allow the Division to reopen the permit to adjust the daily load up to 1 lb/d as a minor modification, if necessary. Total Nitrogen Loading above 1 lb/day will require a wasteload allocation.

The Truckee River has a defined TMDL for Total Dissolved Solids (TDS) at the Lockwood monitoring station. The TMDL is 900,528 lbs/day. The following table details the current and proposed wasteload allocations (WLA).

Facility	TDS WLA
Truckee Meadows Water Reclamation Facility (NV0020150)	Flow < 30 MGD = 90,126 lbs/day Permit Max = 120,168 lbs/day
Vista Canyon Group (NV0020893)	9,730 lbs/day
Sparks Marina Park (NV0022918)	19,390 lbs/day
Wells Manufacturing Company (NV0021849) - Proposed	100 lbs/day
Total:	149,388 lbs/day

The limit for a change in temperature in the stream due to the discharge is the RMHQ in NAC 445A.185.

Dissolved oxygen, chlorides, total suspended solids, sulfate and sodium as Sodium Absorption Ratio are all required water quality standards at Idlewild. Since these parameters have not been required by previous permits, this facility has no routine monitoring data for these items. Therefore, inclusion of these parameters on a monitor and report basis was chosen, and they will be evaluated during the next permit cycle.

**Proposed Determination:** The Division has made the tentative determination to renew the proposed permit for a five-year period.

Prepared by: Jennifer L. Carr, P.E., C.E.M.  
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